

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

The Coleman Company, Inc.,)	
)	
<i>Plaintiff/Counterclaim Defendant,</i>)	
)	
v.)	Civil Action No: 2:20cv351-RGD-RJK
)	
Team Worldwide Corporation, et al.,)	
)	
<i>Defendant/Counterclaim Plaintiffs.</i>)	
_____)	

**DEFENDANT/COUNTERCLAIM PLAINTIFFS TEAM WORLDWIDE
CORPORATION AND CHENG-CHUNG WANG’S MOTION TO COMPEL**

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Local Rule 37(A), Defendant Team Worldwide Corporation and Counterclaim Plaintiff Cheng-Chung Wang (collectively “Defendants” or “TWW”), by and through its undersigned counsel, hereby move to compel discovery from plaintiff The Coleman Company, Inc. (“Plaintiff” or “Coleman”). Specifically, TWW asks the Court to order Coleman to complete its production of documents responsive to each of TWW’s first set of Requests for Production, Nos. 1-97, and TWW’s Interrogatory Nos. 2, 3, 5, 7, and 14 within ten days of the date of the order.

Further support for this Motion is detailed in the Memorandum in Support, filed this same day. A proposed Order granting this relief is attached hereto.

Dated: May 14, 2021

By: /s/
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*Attorneys for Team Worldwide Corporation and
Cheng-Chung Wang*

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2021, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered users.

Dated: May 14, 2021

/s/William R. Poynter

William R. Poynter (VSB No. 48672)

*Attorney for Defendant Team Worldwide
Corporation and Counterclaim Plaintiff
Cheng-Chung Wang*